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November 8, 2018

Christopher Cooke
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The Hon. Judge Kandis A. Westmore
Ronald V. Dellums Federal Building
& United States Courthouse
1301 Clay Street,
Oakland, CA 94612

Re: Snyopsys Inc. v. Ubiquiti Networks, Inc. et al., Case No. 3:17-CV-00561 WHO
Request to Excuse Personal Attendance of Defendant Ching-Han Tsai

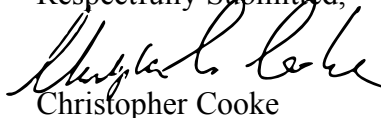
Dear Judge Westmore:

I write to request that defendant Ching-Han Tsai's personal appearance at the November 30, 2018 settlement conference be excused, pursuant to Your Honor's Settlement Conference Standing Order, on the grounds of undue hardship.

Defendant Ching-Han Tsai lives and resides in Taipei, Taiwan. He is one of three defendants in this case; the other two defendants are Ubiquiti Networks Inc. ("Ubiquiti") his former employer, and Ubiquiti Networks International Limited, a Hong Kong based subsidiary of Ubiquiti.

Unlike the other parties in this action (which are large corporations), Mr. Tsai is an individual with limited financial resources. Ubiquiti terminated Mr. Tsai's employment from Ubiquiti in June 2018, resulting in his being unemployed for several months (he has just found work again). During this litigation, Mr. Tsai asserted his Fifth Amendment privilege against self-incrimination during his deposition in April and may not be appearing in person to testify at the trial in February 2019. Mr. Tsai is willing to appear at the settlement conference by video (Skype/Google Hangouts or GoToMeeting) to participate in the settlement conference. His counsel will make the necessary arrangement for his appearance by video, if the Court approves this request. Accordingly, Mr. Tsai respectfully requests that his personal appearance at the settlement conference scheduled for November 30, 2018 at 11 a.m. be excused, and that he be permitted to appear by a video-conferencing service.

Respectfully Submitted,



Christopher Cooke
Attorney for Defendant Ching-Han Tsai

Cc: all Counsel via ECF system